

Confidentiality Policy

Document informing Users about the presence of cookies on the site

1. Introduction

This policy on the use of cookies is designed to inform you of our practices regarding the collection of information from you when you visit our site, through cookies and other tracking technologies, but by observing your right to protection of personal data concerning you.

The Trans Sped website does not collect personal data from visitors. Even if we use Google Analytics, the IPs sent are anonymized, the data being used only to see the number of Users on the site and which pages should be optimized, to ensure our customers a more pleasant experience while browsing the site.

When you submit an order via our dedicated form (User agreement form), that data is processed by us and stored on basis of a qualified certificate agreement/issuance request that you will sign at that time. The data is necessary for the issuance and proper functioning of the certificates.

The confidentiality of information is an ongoing responsibility and we therefore undertake to update this disclosure document from time to time as we undertake new practices related to personal data or adopt new privacy policies. In regard to the processing of data based on consent, we shall notify you of any changes and request your additional consent.

The website www.transsped.ro is operated by S.C. Trans Sped S.A. with the registered office in Bucharest, 38 Despot Voda, district 2, registered with the Trade Register with no. J40/781/2004, with tax ID code RO 12458924, which uses both its own cookies and such from third parties to provide visitors with a better browsing experience and services tailored to the needs and interests of its visitors and customers.

2. Legislative Context

According to the requirements of Directive (EU) 2002/58/EC ("E-Privacy Directive") and Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC ("GDPR Regulation") applicable as of 25 May 2018, we are bound to manage securely and only for the specified purposes, the personal data you provide to us through the use of our website in accordance with the provisions of the GDPR Regulation and the E-Privacy Directive.

In particular, the GDPR Regulation commits us, first of all, to provide the possibility for the User to express or, where appropriate, withdraw his/her consent to the processing of his/her personal data at any time, to rectify the content of personal data or to request the transfer of personal data to another controller, and, secondly, to inform the User about the content of cookies used by our website, what categories of personal data of the User are processed by our cookies, what we do with the information obtained by cookies and where we store such information, providing a high level of security on the information collected

by cookies, the possibility for the User to block at any time the running of any or all cookies by our website, as well as the deletion of the information collected by cookies.

For more details on the content of these legal rules, please visit the following links:

<https://eur-lex.europa.eu/legal-content/RO/TXT/?uri=celex%3A32002L0058>

<https://eur-lex.europa.eu/legal-content/RO/TXT/?uri=CELEX%3A32016R0679>

3. Personal Data Processed by Us

In order to benefit from our services, you will voluntarily supply to us the following types of personal data:

- Surname and forename;
- Personal number
- Number and series of the ID card;
- E-mail address;
- Telephone number;
- Address;
- E-mail;
- Any data comprised in the ID Card/Passport;
- Video and audio identification (if you request our services by remote identification);
- Employee status;
- Position;
- Profession;
- Income, etc.

4. Legal Basis for Personal Data Processing

In accordance with the provisions of Art. 6, para. (1), lit. a) of the Regulation of the European Parliament and of the Council of the European Union No 679/2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR), we process your personal data on basis of your freely expressed consent at the time you tick that you agree with the Privacy Policy and the Terms and Conditions posted on our company website www.transsped.ro at the time you wish to purchase one of our services.

5. Period of Storage/Archiving of Processed Data

Your data will only be kept for as long as necessary to fulfil the purposes for which it was collected or as required by law, after which your personal data shall be deleted or rendered anonymous, unless there is an overriding legal requirement to keep such.

6. Disclosure and Transmission of Processed Data

TRANS SPED SA shall not disclose the data it defines and processes, on all categories of data subjects, to other natural or legal persons. The cases in which your data may be disclosed to other companies or natural persons are those in which other companies, natural or legal persons act as data subjects in the relation with TRANS SPED SA.

We also have the right and the obligation to disclose your data whenever necessary to public authorities and institutions under legal obligations, to lawyers to represent us in case of a dispute or for consultancy purposes, to bailiffs for contractual communications or the enforcement of any court decisions, debt collection firms and in any other justified situations with your prior notice, but only in order to achieve the aforementioned purpose and in order to protect the rights of the data subject as a priority.

TRANS SPED SA does not transfer personal data outside the European Economic Area (EEA).

7. Your Rights

The GDPR Regulation offers certain rights to data subjects. You have the right to access and rectify (correct) the recording of your personal data processed by us if such are inaccurate. You can ask us to delete this data or to stop processing it, subject to certain exceptions. You can also ask us to stop using your data for direct marketing purposes. You have the right to lodge a complaint with the data protection authority if you have concerns about the manner in which we process your personal data. Where technically feasible, we may - on your request - provide you with your personal data or pass it directly to another controller. If access cannot be provided within a reasonable time, we shall provide you with a date when the information will be transmitted. You may also request additional information on: the purpose of the processing, the categories of personal data concerned, which was the source of the information and how long it will be stored. If you wish to exercise any of these rights, please contact our Data Protection Officer at dpo@transsped.ro.

WARNING! Please exercise your rights wisely and remember that abuse of your rights may result in liability.

The contact details of the national personal data protection authority are as follows:

National Supervisory Authority for Personal Data Processing

Address: Bucharest, 28-30 G-ral. Gheorghe Magheru Avenue, District 1, postal code 010336, <http://www.dataprotection.ro>. Contact: Telephone: +40.318.059.211; +40.318.059.212 Fax: +40.318.059.602, e-mail: anspdcp@dataprotection.ro

8. Personal Data Protection Officer

We have appointed a data protection officer for all matters related to the protection of personal data, and you may contact the data protection officer for all matters related to data processing and the exercise of your rights under applicable legal provisions, especially if you have questions or concerns about how we process your personal data. The e-mail address where you can contact the Data Protection Officer is: dpo@transped.ro

9. Your Consent to the Use of Cookies

Once you have accessed our website you will be greeted by a message asking for your consent in accordance with the applicable legal provisions on the categories of cookies that you will agree or not for us to use during your visit to the site. It is also important to note that by consenting to the use of the concerned cookie(s) you also agree to the safe storage of the information collected by the cookie(s) to which you have agreed.

Until the acceptance/refusal process for the use of cookies is completed, no cookie shall be used by our website, except for cookies without which the website cannot function.

Please note that you will at any time have the possibility to block the running of cookies as you will see below, as well as the possibility to delete the information collected by cookies.

10. What is a Cookie?

An "Internet Cookie" (also known as a "browser cookie" or "HTTP cookie" or simply "cookie") is a file of small sizes, made up of letters and numbers, which shall be stored on the computer, mobile terminal or other equipment of the User from which this site is accessed (more details on <https://ro.wikipedia.org/wiki/Cookie>).

The cookie is installed by a request issued by a web-server to a browser (*e.g.* Chrome, Firefox, Safari, etc.) and is completely "passive" (contains no software, viruses or spyware and cannot access information on the User's hard drive).

A cookie consists of 2 parts: the name and the content or value of the cookie. Furthermore, the lifetime of a cookie is determined, and technically only the web-server that sent the cookie can access it again when a User returns to the website associated with that web-server.

Cookies themselves do not require personal information in order to be used and, in most cases, do not personally identify internet users.

There are 2 large categories of cookies:

- Session cookies - these are temporarily stored in the web browser's cookie folder for the browser to remember until the User exits the site or closes the browser window.
- Persistent cookies - these are stored on the hard drive of a computer or device for a duration configured by the website that placed it. This type of cookie can be deleted by the User at any time via the browser settings.

11. What are the Advantages of Cookies?

A cookie contains information that links a web-browser (the browser you use, for example Google Chrome, Safari, Mozilla Firefox, etc.) to a specific web-server, more precisely the server hosting our website. If a browser accesses that web-server again, it can read the information already stored and react accordingly. Cookies provide Users with a pleasant browsing experience and support the efforts of many websites to provide convenient services to Users: for example, online privacy preferences, site language options, shopping carts or relevant advertising.

8. What Is the Lifetime of a Cookie?

Cookies are managed by web servers. The lifetime of a cookie can vary significantly, depending on the purpose for which it is placed. Some cookies are exclusively used for one single session (session cookies) and are no longer retained once the User leaves the website and some cookies are retained and reused each time the User returns to that website (persistent cookies). Nevertheless, cookies can be deleted by a User at any time.

9. How We Use Cookies on this Site

We only use cookies to optimise our website, which come from the Google Analytics platform.

Details of the cookies used by us:

Name	Provider	Purpose	Expiry	Type
<u>_ga</u>	<u>google-analytics.com</u>	Used to distinguish unique Users.	2 years	HTTP Cookie
<u>_gid</u>	<u>google-analytics.com</u>	Used to distinguish Users.	24 hours	HTTP Cookie
<u>_gat_*</u>	<u>google-analytics.com</u>	Used to check access speed and speed up request rate - limits data collection on high traffic sites.	10 minutes	HTTP Cookie
cookieconsent_dismissed	Trans Sped	Hide pop-up cookies after you have agreed to it.	1 year	HTTP Cookie

Your personal data is never sent to our partners, except for the data entered in the newsletter subscription form. The IP collected with the help of trackers is anonymized and used only for Geolocation purposes, without reaching Google's servers. The analytics service is only used to get a better idea of our Users, not to track their activity on the internet.

If you choose to subscribe to our newsletter, we shall occasionally send you information that you may find useful, related to our digital certificates and our company. In such case, your personal data (name, email and telephone) shall be used to contact you and shall be shared with the emailing service we use. Your data shall be kept until you choose to unsubscribe from our newsletter.

If you feel that your personal data is being used inappropriately by us, please visit our contact page where you will find out how you can contact us. We shall promptly reply to your request and try to solve the issue.

You have the right to ask us not to process your personal data at all. We shall inform you why we need to collect this data or if we need to disclose your data to third parties (see above in which cases). You can exercise your right to ask us not to process your data by ticking boxes on the forms used to collect this data or you can always ask us not to process your data by accessing the contact page.

10. How Can you Stop Cookies?

Disabling and refusing to receive cookies may make certain sites impractical or difficult to visit and use. Also, refusing to accept cookies does not mean that you will no longer receive/see online advertising.

It is possible to set your browser not to accept cookies, or you can set your browser to accept cookies from a specific site. But, for example, if you are not registered using cookies, you will not be able to leave comments.

All modern browsers offer the possibility to change cookie settings. These settings are usually found in the "options" or "preferences" menu of your browser. In order to understand these settings, the following links may be useful, otherwise you can use the "help" option of your browser for more details.

[Cookie settings in Chrome](#)

[Cookie settings in Firefox](#)

[Cookie settings in Safari](#)

If you want to know more about cookies and what they are used for, we recommend the following links:

- [All About Cookies](#)
- [Microsoft Cookies guide](#)
- IAB Romania sets available the following site to provide more information on privacy related to online advertising: <http://www.youronlinechoices.com/ro/>

To opt-out of being tracked by Google Analytics please visit: <http://tools.google.com/dlpage/gaoptout>.

11. Storage of Information Captured by Cookies

The information obtained by cookies is stored under high security conditions by the web-server, *i.e.* the server hosting our website. We assure you that our web-server has to comply with high security requirements regarding the information collected by cookies and is bound to strictly comply with the obligations imposed by the applicable law. The information we collect about you by accessing our website shall not be shared with third parties.

12. Personal Data Security

In order to protect the confidentiality of your data and personal information that you transmit through the use of this website, we shall maintain physical, technical and administrative safeguards.

We update and test our security technology on an ongoing basis. We restrict access to your personal information to those employees who need to know that information in order to provide you with benefits or services. Furthermore, we train our employees on the importance of privacy and maintaining the confidentiality and security of your information.

If a leak of personal data occurs, we shall use our best efforts to eliminate it and assess a level of risk related to the leak in accordance with our personal data breach policy. If it is determined that the leak may result in physical, material or non-material harm to you we shall contact you without undue delay, unless otherwise required by law. All our steps shall be taken in full cooperation with the competent supervisory authority.

13. Security Issues Related to Cookies

Cookies are NOT viruses! They use plain text formats. They are not made up of pieces of code so they cannot be executed nor can they auto-run. Consequently, they cannot be duplicated or replicated on other networks to run or replicate themselves again. Since they cannot perform these functions, they cannot be considered viruses.

Cookies can however be used for negative purposes. Due to the fact that they store information about Users' preferences and browsing history, both on a particular site and on many other sites, cookies can be used as a form of Spyware. Many anti-spyware products are aware thereof and constantly flag cookies for deletion as part of anti-virus/anti-spyware deletion/scanning procedures.

In general, browsers have built-in privacy settings providing different levels of cookie acceptance, validity period and automatic deletion after the User has visited a particular site.

As identity protection is very valuable and is the right of every internet User, it is advisable to know what possible issues cookies can create. As cookies constantly transmit information back and forth between the browser and the website, if an attacker or unauthorised person intervenes in the data transmission path, the information contained in the cookie can be intercepted. Although very rare, this can happen if the browser connects to the server using an unencrypted network (*e.g.* an unsecured WiFi network).

Other cookie-based attacks involve incorrect cookie settings on servers. If a website does not require the browser to use only encrypted channels, attackers can use this vulnerability to trick browsers into sending information through unsecured channels. Attackers then use the information to gain unauthorised access to certain websites. It is very important to be careful in choosing the most appropriate method of protecting personal information.

14. Privacy Policy Changes

Any changes occurring to our privacy policy shall be posted on this page or, where appropriate, notified to you by email. Please check this section frequently for any changes.

15. Contact

If you have any questions about your personal information or if you wish to enforce your rights or have any queries or complaints, please contact us by sending an email to the Data Protection Officer at dpo@transsped.ro.

If you do not want us to use the information you have provided to us, please send us an e-mail to office@transsped.ro with the subject "Do not use my data" and your name.

To update or correct your personal data, please contact the Data Protection Officer at support@transsped.ro.